

# **Exhibit**

# **A**

**Wasikowski, Nancy**

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**From:** Movius, David  
**Sent:** Thursday, June 13, 2013 3:44 PM  
**To:** 'Yanchar, Georgia'  
**Cc:** 'McMullen, Dan'; 'McLandrich, John'  
**Subject:** MRI's Document Production

Georgia –

Based on our preliminary review of the documents produced by MRI this week, we have identified the following issues and request MRI's prompt response:

Scope of MRI's Production: It appears that MRI has not produced any, or in some cases just a few, documents in response to a number of Lynx's requests, including for example, Request Nos. 4-6, 11-15, 17-20, 22-64, 69-74, 78-81, 87-88, 91, 93 and 94-96. Moreover, MRI's production does not include any emails or other correspondence. Please confirm whether MRI regards its production as complete and, if not, the date on which it will produce the remaining responsive materials.

Request No. 1: While it appears that MRI has produced a number of the specimens deposited with the Copyright Office for the registrations at issue in this case, it has produced them separate from the registrations themselves and it has not included the applications themselves, all related correspondence or any documents relating to its decision to file for registration as requested by Lynx. Moreover, by producing the specimens separate from the related applications and other documents, it is unclear which specimens correlate to the various copyright registrations. Therefore, please supplement MRI's production by providing the complete applications as submitted to the Copyright Office and the related materials, as requested.

Request No. 2: MRI's objections to this request are unfounded, and Lynx asks that they be withdrawn immediately. The source code could not be more relevant, and MRI's objection that it does not know what is meant by "source code" is without merit. Therefore, please produce the requested source code in native ASCII file format.

Request No. 3: MRI's objection that it does not know what is meant by "database schema" is without merit and should be withdrawn. Moreover, a number of the documents produced in response to this request, including the multiple versions of the "database\_script.sql" files produced as MRI-LYNX\_003699 through MRI-LYNX\_005872 and MRI-LYNX\_006254 through MRI-LYNX\_029026 appear to have been produced from documents that were printed and then scanned and as such are, in significant part, effectively illegible. Therefore, please re-produce these documents in native ASCII file format.

MRI-LYNX\_005873: Please produce a native copy of this file with all related metadata intact. Also, please produce all other documents and material relating to this document, including but not limited to the following information referenced in this document (which are responsive to at least Request No. 13): all information provided by the "team of consultants and sales reps that have done work in Canada"; documents relating to the "client interviews in Ontario and Quebec"; documents relating to the "Canadian Pack Development"; and any documents relating to any conference or confirmation by "Shane/Ann/Pat."

Corrupt Files: The files for the following documents are corrupt and cannot be opened: MRI-LYNX\_003204.PDF; MRI-LYNX\_003376.PDF; MRI-LYNX\_003377.PDF; MRI-LYNX\_003552.PDF; MRI-LYNX\_003554.PDF; and MRI-LYNX\_003555.PDF. Please provide non-corrupt copies of these files.

Blank File: The MRI-LYNX\_003683.PDF will open, but other than the "ATTORNEYS EYES ONLY" designation and bates numbers, its contents is blank. Please either confirm that this document was intended to be blank or provide a new copy with the intended contents.

Lynx, of course, reserves the right to identify additional issues with respect to MRI's production, and we will be addressing MRI's interrogatory responses separately. I can be available tomorrow between 11:30 am and 3 pm to meet and confer if you have any questions regarding the foregoing. Otherwise, we look forward to receiving your prompt response to each of these issues.

Regards,

Dave

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